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February 28, 2006

PG&E Letter HBL-06-009

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555-0001

Docket No. 50-133, OL-DPR-7 Humboldt Bay Power Plant Unit 3 <u>Semi-Annual Fitness for Duty Performance Report for the Period of August 17, 2005,</u> through December 31, 2005

Dear Commissioners and Staff:

Pursuant to 10 CFR 26.71(d), Pacific Gas & Electric Company (PG&E) is submitting the enclosed Fitness for Duty (FFD) Performance Report for the period of August 17, 2005, through December 31, 2005. The performance data has been compiled on the standard forms developed by the Nuclear Energy Institute and is provided in Enclosure 1. As noted in Enclosure 1, individuals being screened for initial unescorted security access (pre-employment testing 30 days prior to being cleared) are tested at lower cut-off levels for marijuana and amphetamines, and two additional substances. This testing is reported under the pre-access category and is conducted in accordance with 10 CFR 26.

Humboldt Bay Power Plant personnel initiated this FFD program in accordance with NRC Order EA-03-099, which required the program to become operational no later than August 17, 2005. No random tests were conducted prior to that date.

Statistical analysis of the data was conducted and the results are provided in Enclosure 2. During this period, no supervisors tested positive. There were no significant FFD event reports made during this period.

Enclosure 3 provides a summary of program activities for the reporting period.

If you have any questions regarding the enclosed information or other FFD Program activities, please contact Ryan L. Whitford Access Authorization/Fitness for Duty Coordinator at 707-444-0784.

Sincerely,

David H. Oatley

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Document Control Desk February 28, 2006 Page 2

**Enclosures** 

cc:

cc/enc:

Richard E. Enkebol, NEI

Emilio M. Garcia John B. Hickman Bruce S. Mallet

PG FossilGen HBPP Humboldt Distribution

FITNESS FOR DUTY PERFORMANCE DATA AUGUST 17, 2005, THROUGH DECEMBER 31, 2005

# Fitness for Duty Program Performance Data Personnel Subject to 10 CFR 26

### PACIFIC GAS AND ELECTRIC COMPANY

December 31, 2005

Company

6 Months Ending

**HUMBOLDT BAY POWER PLANT** 

Location

RYAN L. WHITFORD, ACCESS/FITNESS FOR DUTY COORDINATOR

(707) 444-0784

**Contact Name** 

Phone (including area code)

Cutoffs:

Screen/Confirmation (ng/ml)

Appendix A to 10 CFR 26

Pre-employment Screening

Marijuana 20 / 10

Amphetamines 300 / 250

Barbiturates 300 / 250

Cocaine 300 / 150

Phencyclidine 25 / 25

Benzodiazepines 300 / 250

Opiates 300 / 300

Alcohol (% BAC) 0.04%

Testing Results  Average Number with Unescorted Access: 93  Categories		Licensee Employees		_	-Term r Personnel	Short-Term Contractor Personnel 0	
					6		
		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		4	0	0	0	0	0
For Cause	Post-accident	0	0	0	0	0	0
	Observed behavior	0	0	0	0	0	0
Random		25*	0	0	0	0	0
Follow-up		0	0	0	0	0	0
Other**		16	0	16	0	0	0
Total		45	0	16	0	0	0

<sup>\* 27</sup> random tests were actually completed, however; 2 tests were later determined to be invalid. Please see Enclosure 3, Activity 1 for more details.

<sup>\*\*</sup> Testing of FFD Administrative Staff

### **Breakdown of Confirmed Positive Tests for Specific Substances**

	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine			Benzo- diazepines
Licensee Employees	0	0	0	0	0	0	0	0
Long-Term Contractors	0	0	0	0	0	0	0	0
Short Term Contractors	0	0	0	0	0	0	0	· 0
Total	0	0	0	0	0	0	0	0

## STATISTICAL ANALYSIS FOR REPORTING PERIOD AUGUST 17, 2005, THROUGH DECEMBER 31, 2005

Analysis of the data indicates that 26.88 percent of the average eligible population was randomly tested during the period August 17, 2005, through December 31, 2005. The expected test rate for this period was 17.34 percent.

The overall positive test rate for this period was 0.0 percent as there were no positive tests during this period.

PG&E submitted blind performance specimens in accordance with 10 CFR 26, Appendix A, Section 2.8 (e)(2), requirements. There were no reportable events.

#### FITNESS FOR DUTY PROGRAM ACTIVITY REPORT

### **Activity 1: Failure to Conduct Two Breath Tests**

During the reporting period, a Quality Verification Assessment discovered that on two occasions the Collection Site Person (CSP) failed to administer two breath tests as required by 10 CFR 26 Appendix A. This oversight on the part of the CSP was determined to be the result of inexperience due to the youth of the Fitness for Duty Program. The tests in question had negative results of 0.0% BAC. FFD program personnel considered these test to be valid, however; they were not included in calculations for percentage of the plant population tested. To compensate for these two random tests not being included in our total number, FFD program personnel increased the frequency of random testing for the remainder of the reporting period. This activity was entered in to the plant's corrective action program upon discovery.